

# Morgan Lewis

**Tim Bransford**

tim.bransford@morganlewis.com

December 15, 2017

***Via ECFS***

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: Ex Parte Letter**

***Promoting Investment in the 3550-3700 MHz Band, GN Docket No. 17-258;  
Wireless Telecommunications Bureau and Office of Engineering and Technology  
Establish Procedure and Deadline for Filing Spectrum Access System (SAS)  
Administrator(s) and Environmental Sensing Capability (ESC) Operator(s)  
Applications, GN Docket No. 15-319***

Dear Ms. Dortch:

RED Technologies SAS (“RED Technologies”), a prospective future Spectrum Access System (“SAS”) administrator, by its counsel herein submits this *ex parte* communication in support of Federated Wireless, Inc.’s (“Federated”) submission in GN Docket Nos. 15-319 and 17-258 filed on December 5, 2017.<sup>1</sup>

RED Technologies enthusiastically concurs with Federated that the wireless communications industry stands ready to commercially launch Citizen’s Broadband Radio Service (“CBRS”) in mid-2018. An equipment ecosystem has begun to rapidly develop, network service providers are clamoring for the additional capacity and favorable propagation characteristics offered by the 3550-3700 MHz (“3.5 GHz”) spectrum CBRS will unleash, and wireless broadband end users (consumer and enterprise) eagerly await the relief that the 3.5 GHz will offer. RED Technologies also agrees with Federated that the Federal Communications Commission (“FCC” or “Commission”) establishing June 30, 2018 as a firm deadline for concluding the first wave of SAS administrator certifications, as well as setting a concurrent deadline for the certification of the initial Environmental Sensing Capability (“ESC”) administrators, will serve as an important initial step towards ensuring a mid-2018 commercial launch of CBRS. Conversely, delaying certification of these important mechanisms that enable shared use of the 3.5 GHz will inject doubt into the regulatory process and potentially undermine the long-term viability of the CBRS

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<sup>1</sup> See *Ex Parte Notice* of Ross Vincenti, Federated Wireless, Inc., GN Docket Nos. 15-319 and 17-258 (Dec. 5, 2017) (“*Federated Ex Parte*”).

**Morgan, Lewis & Bockius LLP**

1111 Pennsylvania Avenue, NW  
Washington, DC 20004  
United States

**T** +1.202.739.3000  
**F** +1.202.739.3001

regulatory framework. Accordingly, as a future SAS administrator and global leader in the development of dynamic spectrum management solutions, RED Technologies affirms and seconds Federated's position that "it would benefit all stakeholders, including industry and the Commission, if a deadline for certifications is set for June 30, 2018."<sup>2</sup>

Moreover, as a second wave SAS administrator applicant,<sup>3</sup> RED Technologies has additional concerns with respect to the lack of transparency and visibility about (1) the timing for conditional approval of second wave applicants, and (2) the schedule and process for second wave applicant certification. Such uncertainty as to both timing and process on the second wave undermines both investment and momentum in CBRS in the same ways it affects the first wave of applicants as expressed by Federated in the above-referenced *ex parte* notice. RED Technologies urges the Commission to consider granting the second wave conditional approvals on a rolling basis, rather than evaluating and releasing a list of the conditionally approved SAS Administrators and ESC operators at once. RED Technologies also urges the Commission to allow second wave applicants to seek certification expeditiously, and to ensure that certification for second wave applicants can occur promptly after the first wave applicants conclude their certification.

If you have any questions regarding this filing, please feel free to contact the undersigned.

Respectfully submitted,

/s/ *Tim Bransford*

Tim Bransford

Counsel for RED Technologies SAS

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<sup>2</sup> *Federated Ex Parte* at 2.

<sup>3</sup> Red Technologies filed its application to serve as a SAS Administrator on May 5, 2017 in response to the FCC's request for "Second Wave" applications.